

# **Exhibit 18**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
Charleston Division**

DEREK CLEMENTS, <i>et al.</i> ,	)	
	)	
Plaintiffs	)	
	)	
v.	)	Civil Action No. 2:22-cv-02069-RMG
	)	
LLOYD J. AUSTIN, III, <i>et al.</i> ,	)	
	)	
Defendants.	)	
_____	)	

**DECLARATION OF CADET JIN JOHNSON**

I, Jin Johnson, am a Cadet at the United States Coast Guard Academy.

This affidavit details some of the harassment that I have received from the Academy in the last year.

I have been forced to wear a mask due to my religious/vaccination status while the rest of the corps was able to take them off for many months. I was then placed under fraudulent investigation due to a comment where I was talking with my friend and compared being solely forced to wear the mask to the Jewish community being forced to wear the golden star under Nazi Germany. I made the comparison between the two on the basis that I am being marked and outed for my religious status. This claim was submitted to CGIS presumably by one of the individuals instructed to follow me around in order to find things to get me in trouble for, of which I will detail in the next paragraph. This individual filed a harassment complaint for

discrimination. I received verbal confirmation from CDR Casavant on 15 August 2022 that the claim was found to have had no substance and the case is closed.

I was informed by a cadet in Alfa Spring 2022 Company Command that they were informed to be on alert and always looking out for the unvaccinated cadets in order to give them as much punishment as possible according to the regulations. This cadet notified me because they were concerned that this was discriminatory policing being ordered from above. TO contextualize the situation, they had previously threatened a the graduating unvaccinated 1/c cadet with multiple Class 1 offenses, enough that he would get disenrolled for them. They informed him that if he got the vaccine that the investigation would go away. Shortly afterwards he received the vaccine in the clinic and the investigations were dropped to Class 2 levels (not very severe, allowing him to graduate).

I was verbally and physically threatened by an intoxicated Captain Arthur Ray, the Academy Commandant of Cadets. He attempted to “square up” with me due to him being tired of my “clownery” regarding seeking a religious accommodation for the vaccine. He contacted me with his chest while goading me to “swing on him,” prevented me from answering any questions and then berated me before departing the building. This was due to the fact that I had waited in front of CDR Maureen Johnson’s office for nearly 2 hours in order to determine the status of my and other unvaccinated cadets special request forms in order to depart on leave within the next 18 hours. These specials had been “in processing” for multiple weeks at this point. I had met with CDR Johnson earlier that day to check where she instructed me to come by

later due to the fact that they were not done and that she would be here all night due to billet night.

I was directly told by CDR Johnson to “not box Capt Ray in with legal questions” during the C division scheduled Q&A regarding the vaccine mandate. This was because I questioned them about the legality of the mandate in its current status and whether or not the Academy or any institution at all could provably provide FDA BLA approved vaccines as the mandate states are required for mandating on members. She then also claimed that the difference between EUA and BLA vaccines did not matter and to “just do what you are ordered to do.”

I have been asked on many occasions to sit multiple seats spaced away from any other classmate and to sit in the corner of the room.

I have been restricted from traveling from the Academy as vaccinated cadets were allowed to due to my status despite command being unable to provide scientific or any reason for their actions.

I have been denied the ability to even seek a medical exemption even if I pay for all of the testing to do so myself by LCDR Chris and LCDR Blanchet at the Academy Clinic.

I have asked Chief Cuevas and LT Rockwell on many occasions whether or not the vaccines that they provide follow the mandate as outlined in Federal Code and the multiple

memos regarding the use of EUA vs BLA vaccines. Each time they refused to give an answer and stated that they would “get back to me” yet never did in any occasion.

I have been forced to wear a mask outside while participating in the Fitness Exam where vaccinated individuals were not, significantly restricting my breathing. It is not an issue for me because I do well on the fitness exam anyways, but for those unvaccinated who come close it was a large detriment and in some cases caused them to fail. This is despite the test being administered outside with ample space for distancing requirements. This was ordered by RADM Kelly, that being unvaccinated are required to mask outside.

This is not all of the incidents that have occurred, but highlight the most common issues.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 17<sup>th</sup> 2022.



Jim Johnson